Certified Orientation and Mobility Specialist (COMS)

Code of Ethics with Addendum on Remote/Virtual Instruction

Preamble

Certified Orientation and Mobility (O&M) Specialists (COMS) recognize the significant role that independent movement plays in the overall growth and functioning of individuals with visual impairment. COMS dedicate themselves to help individuals receive the services they need, to which they are entitled, and to attain the maximum level of independence commensurate to their unique strengths, needs, abilities, goals, and preferences. A COMS develops and utilizes specialized knowledge to accomplish this goal while collaborating with other professionals. The possession of specialized knowledge obligates the COMS to protect the rights of the individuals served. The Code of Ethics provides guidance for ethical practice but is not intended to serve as an exhaustive list of every possible ethical or unethical behavior. The COMS is responsible for identifying and implementing a sound decision-making model involving professional discussions with appropriate parties when questions arise regarding ethical practices that are difficult to answer alone. To assure the public of the COMS' awareness and commitment to this obligation, the specialist commits to the Code of Ethics for COMS, henceforth referred to as the Code.

COMS pledge themselves to maintaining integrity, excellence, and accountability as it relates to their commitment to the client, the community, the profession, colleagues and other professionals, and professional employment practices. The following principles and associated standards of conduct guide this commitment.

Principle 1: The COMS will value the worth, dignity, and self-determination of each individual.

1.1. The COMS will respect the rights of the client, family, support network and/or legal representative to participate in decisions regarding the instructional program.
1.2. The COMS will collaborate with the client served to identify their needs and to make decisions about intervention that are in the best interest of the client and relevant others.
1.3. The COMS will exemplify conduct that does not discriminate or knowingly engage in behavior that is harassing or demeaning based on age, gender, gender identity, race, ethnicity, culture, national origin, religion, sexual orientation, disability, socioeconomic status, or on any other basis prohibited by law.

Principle 2: The COMS will respect the privacy, right to consent, and confidentiality of the client.

2.1. The COMS will obtain full informed, documented permission from the client or legal representative before releasing information to a requesting agency or individual.
2.2. The COMS will ensure all client information obtained through or stored in any medium (e.g., hard copy, audio-visual, electronic, digital) remains confidential, unless authorized to divulge this information by the client and/or legal representative, required by law or institutional policies, or because withholding such information would endanger the well-being of the client or the public.

[1]Along with the International Guide Dog Federation, ACVREP, throughout this COMS Handbook, uses “guide dog” as a generic term for assistance dogs that work with people who have low vision or blindness, including Seeing Eye Dogs, Leader Dogs, Pilot Dogs, etc. The term “dog guide” is used when referring to guides, comparing dog and human guides, or when agency branding is a sensitive issue.

2.3. The COMS will ask the consent of the client served, or when applicable their family, support network or legal representative, before inviting others to observe a lesson or arranging to have the individual photographed or recorded.
2.4. The COMS, who is conducting research, will follow research ethics board procedures relevant to their jurisdiction and seek informed consent, including making clear the plan for maintaining confidentiality and the right of the participant to withdraw.

Principle 3: The COMS will be accountable for exercising sound professional judgements.

3.1. The COMS will adequately assess the needs and current capability of the individual client.
3.2. The COMS will make reasonable attempt to obtain, evaluate, and conduct a review of records relevant to the O&M assessment prior to instruction.
3.3. The COMS will identify and address interfering conditions and take reasonable precautionary actions.
3.4. The COMS will seek the advice and counsel of colleagues whenever such consultation is in the best interest of the client and does not jeopardize confidentiality.
3.5. The COMS will collect appropriate data to monitor client progress and determine outcomes of service.
3.6. The COMS will make all reports objective and will present only data relevant to the purposes of the evaluation and instruction. When appropriate, the specialist will share information with the client and/or the family and/or legal representative.
3.7. When planning or using alternative or new methods for instruction (e.g. remote supervision, role release, group instruction), the COMS will consider the safety and the best interest of the client, impact on team members, ethical implications of the method based on ACVREP standards, consultation with relevant professionals and jurisdiction regulations.
3.8. The COMS will evaluate the strength of evidence and applicability of content from professional development before integrating it into practice.

Principle 4: The COMS will promote organizational and business practices that benefit clients and society.

4.1. The COMS will ensure appropriate instructional design and implementation of lessons occur without undue consideration of personal comfort or convenience.
4.2. The COMS will be responsible for O&M services to individuals when any portion of the service is assigned to O&M students, interns or other stakeholders under his or her supervision.
4.3. The COMS supervising interns will provide adequate direct supervision to ensure intern skill development and client well-being, with decreasing supervision occurring when the COMS concludes an intern achieves applied/clinical competency.
4.4. The COMS will advocate for the rights of all individuals with visual impairments to receive appropriate services.
4.5. The COMS will not train any person to be an O&M Specialist outside of a recognized university preparation program or government-approved training program.

4.6. The COMS who is responsible for education and professional preparation programs will take reasonable steps to ensure that the programs are designed to provide the appropriate knowledge and proper experiences for students enrolled in such programs, and to meet the requirements for licensure, certification, or other goals for which claims are made by the program.
4.7. The COMS will decline position of employment where ethical principles of O&M practice are knowingly compromised or abandoned, unless the position is accepted with the intention of amending or modifying the questionable practices and providing that he or she does not participate in the behavior which violates the Code.
4.8. The COMS will only accept direct remuneration for professional instruction from a client who is also entitled to instruction through an agency or school, if the client is fully informed of the services available and elects to contract privately with the specialist.
4.9. The COMS will not engage in commercial activities that result in a conflict of interest between these activities and professional objectives with the client.
4.10. The COMS will report suspected or known negligence, illegal, or unethical behavior in the practice of the profession to appropriate authorities, in accordance with ACVREP Standards.

Principle 5: The COMS will maintain integrity in their relationships with clients, colleagues, other professionals, and the community.

5.1. With the client's consent, the COMS will endeavour to provide those involved in the individual's life with sufficient knowledge, instruction, training and experiences relative to O&M to secure their support in facilitating the goals of the client.
5.2. The COMS will work to develop and be actively involved with Professional Learning Communities and Communities of Practice to nurture interdisciplinary teaming and collaboration including appropriate referrals, e.g., support cane, walker, wheelchair.
5.3. The COMS will endeavor to establish and maintain a trusting relationship with the client and maintain ethical standards of behavior. Any prior and/or present conflicts of interest will be managed through full disclosure and provision of services by another COMS. If another COMS is not available, the nature of the conflict/relationship will be made known to the COMS' supervisor(s) or contracting authority for orientation and mobility services for the client's protection and to avoid the appearance of impropriety.
5.4. The COMS will maintain good will in all activities relating to their client and will not tolerate or engage in any activity that results in the exploitation of the client. Exaggeration, sensationalism, superficiality, and other misleading activities must be avoided.
5.5. The COMS will endeavor to disseminate information to service providers involved with the client as it relates to O&M knowledge, instruction, and experiences so as to facilitate the goals of the client, provided such information does not jeopardize client confidentiality.
5.6. The COMS will graciously refuse gifts and/or gratuities leading to or influencing a conflict of interest.
5.7. The COMS will seek harmonious relations with other professionals, support people, and service providers including those chosen by the client. This includes, with the client's or legal representative's individual's consent, discussion regarding the benefits to be

obtained from O&M services and the free exchange of ideas regarding the welfare of the client served.

5.8. In such situations where team decisions are made, the COMS will contribute information from his or her own particular perspective and will abide by the team decision unless the team decision requires that he or she act in violation of the Code of Ethics.

Principle 6: The COMS will provide comprehensive, accurate, and objective information when representing the profession.

6.1. The COMS will provide information regarding the various types of O&M devices and strategies, and will explore with the client which devices and strategies will best meet the specific assessed needs of the client. The COMS will not dispense or supply O&M equipment unless it is in the best interest of the client.

6.2. The COMS will contribute to community education by using formal and informal opportunities to describe the nature and delivery of O&M services, and to indicate how the community can support the self-determination of people with blindness or low vision.

6.3. The COMS will interpret and use the writing and research of others with integrity when making presentations, writing, or conducting research. This includes being familiar with and giving appropriate recognition to previous work on the topic, and giving appropriate level of credit through joint authorship or acknowledgement to those contributing significantly to research or concept development.

6.4. The COMS reviewing material submitted for presentation, publication, grant, or research proposal will respect and guard the confidentiality of and the proprietary rights in such information of those who submitted it.

6.5. The COMS will ensure the honest and accurate reporting of the nature of the service provided, credentials, fees, and charges.

Principle 7: The COMS will enhance their expertise through lifelong learning and refinement of knowledge, skills, abilities, and professional behaviors.

7.1. The COMS will reflect on interactions with individuals and other stakeholders to determine areas for further learning and self-improvement, and seek feedback on their own performance from colleagues and mentors in the field.

7.2. The COMS will make efforts to share their knowledge and expertise with others in the field, interns, and other professionals as a means of contributing to the lifelong learning of colleagues in the profession.

ADDENDUM TO THE COMS CODE OF ETHICS ON REMOTE/VIRTUAL INSTRUCTION

Core position: Remote and/or virtual Orientation and Mobility (O&M) may support limited, low-risk, consultative, preparatory, or follow-up activities when appropriate for learner safety and instructional validity. It is not an interchangeable substitute for in-person O&M assessment or instruction when direct observation or monitoring, physical modeling, immediate intervention, real-time environmental analysis, or timely correction is required.

Purpose and Scope

This position establishes clear ethical and safety boundaries for the use of remote and/or virtual O&M instruction and assessment by a Certified Orientation and Mobility Specialist (COMS). It is intended to protect learners, support defensible professional decision-making, clarify liability-sensitive practice areas, and preserve public trust in the O&M profession.

This position applies across educational, rehabilitation, and community-based settings across the lifespan. It recognizes that service systems vary. This includes individualized assessment and program planning, ongoing evaluation of client performance and travel environments, sound professional judgment, ethical practice, and the promotion of safe, efficient, and independent travel remain controlling considerations regardless of setting, staffing, geography, cost, technology availability, or administrative preference.

Definitions

Term	Working definition
Remote Service Delivery	O&M instruction or assessment in which the specialist and client are not physically co-located, and technology (video, phone, or asynchronous means) is used to bridge that distance while the client engages with real, physically instantiated environments and tasks.
Virtual Service Delivery	O&M instruction or assessment in which the client engages in a simulated, computer-generated environment or task — regardless of whether the specialist is physically present or remote.
Supplemental	Remote or virtual service added to an otherwise appropriate in-person O&M program. It must not be used as a label for replacing in-person instruction that the learner needs.
Consultative	Support to family members, school staff, team members, programs, or environmental planning. It must not be used as a label for remote direct instruction that functionally replaces necessary in-person O&M.
Temporary	Time-limited, situation-specific, documented, and linked to a clear plan for in-person assessment or instruction when direct service is required.

Position Statement

Remote and/or virtual O&M instruction and assessment may be used by a COMS only as a limited-service delivery approach when it is learner-centered, ethically sound, individually justified, documented, and consistent with ACVREP standards, the COMS Scope of Practice, and the COMS Code of Ethics.

The COMS retains full professional responsibility for assessment, instructional decision-making, risk analysis, documentation, recommendations, and outcomes regardless of service delivery format. Delegating physical presence to an intern, paraeducator, parent, caregiver, Teacher of the Visually Impaired (TVI), school staff member, volunteer, or other support person does not transfer or reduce the COMS's ethical responsibility or potential professional liability (COMS Code of Ethics, Principles 3 & 4).

Remote and/or virtual service must never be selected primarily for staffing convenience, financial concerns or motivations, travel distance, scheduling difficulty, vendor availability, administrative preference, or pressure from an employer or contracting entity. Operational barriers may require creative problem-solving, but they do not override the COMS's professional obligation to provide or recommend the mode of service necessary for safe, valid, and appropriate O&M service.

Remote and/or virtual O&M must be modified, deferred, suspended, or refused when the COMS cannot obtain sufficient information, observe performance adequately, manage foreseeable risk, provide immediate correction, or intervene without delay when a safety concern arises.

Non-Negotiable Limits: Activities That Must Not Be Taught, Assessed, Supervised, or Approved Virtually

A COMS must not introduce, teach, assess, correct, supervise, authorize, or delegate active performance of the following activities through remote or virtual means:

- Initial, comprehensive, eligibility, discharge, or other O&M assessment, including any assessment used to determine travel readiness, independent travel status, programming recommendations, accommodations, and modifications, service intensity, or reduction/termination of direct service.
- Introduction of new O&M skills, techniques, or travel behaviors that require physical modeling, tactile/kinesthetic feedback, real-time correction, or direct observation of body mechanics.
- Cane techniques and mobility device techniques, including initial cane instruction, cane arc, rhythm, grip, coverage, timing, diagonal technique, touch technique, constant contact, two-point touch, shorelining, trailing, drop-off detection, obstacle negotiation, veer correction, and alignment.
- Stair travel, including ascending, descending, locating stairs, managing landings, judging stair depth/height, recovery from misstep, or use of cane techniques on stairs.

- Street crossings of any type, including signalized intersections, uncontrolled crossings, driveways, parking lots, curb ramps, roundabouts, channelized turn lanes, or any crossing involving moving vehicles, cyclists, micromobility users, or unpredictable pedestrian flow or role release for teaching of street crossings.
- Travel on public transportation, including bus, rail, rideshare, transfers, station navigation, platform safety, boarding, exiting, fare systems when connected to active travel, and any real-time navigation around transit vehicles or platforms.
- Any lesson or assessment that requires immediate real-time feedback with no lag, delay, buffering, loss of video/audio, camera blind spot, or reduced environmental awareness.
- Anything in motion, including active route travel, moving through traffic environments, moving through crowds, crossing parking lots, responding to moving obstacles, using stairs or escalators, elevators in crowded or complex settings, revolving doors, or navigating unpredictable travel environments.
- Any activity in which the COMS cannot immediately intervene to minimize risk of foreseeable harm, cannot verify environmental conditions, cannot assess the relevant safety cues, or cannot accurately evaluate the learner's response to risk.

Liability-sensitive hard line: A live video connection, smart glasses feed, phone camera, or on-site non-COMS support person does not promote the opportunity to minimize risk as an in-person COMS who can monitor the full environment, analyze risk directly, correct performance immediately, and physically intervene when needed.

Potential Opportunities: Activities That May Be Addressed Through Remote or Virtual O&M Instruction

Remote and/or virtual O&M may be appropriate when the COMS determines and documents that the activity is low risk, the learner's needs and current skill level support the format, and the activity does not require direct observation or monitoring of active travel performance or immediate physical intervention. Examples may include:

- Interviews, history gathering, review of records, discussion of learner goals, and family or team consultation.
- Pre-teaching, review, or reinforcement of concepts that do not involve active travel risk, such as body concepts, environmental concepts, orientation terminology, map skills, numbering systems, route preview, or problem-solving discussion.
- Planning for future in-person instruction, including route planning, environmental preview, transportation option discussion, paratransit application support, and preparation for travel questions.
- Review of previously taught and in-person verified skills, when the activity remains conversational, reflective, or planning-based rather than active instruction or assessment of movement.
- Assistive technology discussion or coaching when the technology use does not require active travel in motion or create a distraction during safety-sensitive travel.

- Professional consultation with team members about environmental accessibility, policy, scheduling, documentation, or service planning.
- Post-lesson reflection, self-advocacy discussion, soliciting assistance role-play, and safety planning that does not involve live performance in an uncontrolled environment.

COMS-Led Decision-Making and Implementation Requirements

The COMS must lead discussions with the learner, family members, service team, employer, school, agency, or contracting entity and determine whether remote or virtual O&M is appropriate, ethical, and instructionally valid. This determination must be individualized, documented, and revisited throughout service delivery. Administrative preference, staffing limitations, cost, travel distance, or technology availability may inform planning, but they must not override the COMS's professional judgment.

The decision process described in this document is intended to support defensible professional reasoning; it is not a checklist that converts an unsafe or invalid activity into an acceptable remote service. If the COMS cannot obtain sufficient information, observe performance adequately, manage foreseeable risk, provide timely correction, or intervene without delay; remote or virtual service must be modified, deferred, suspended, or refused.

Core Questions for the COMS-Led Discussion Regarding Remote or Virtual Instruction

1. **What is the purpose of the service?** Identify whether the O&M services are assessment, instructional, consultative, planning, concept review, or follow-up. If the purpose involves active movement, travel performance, new skill acquisition, immediate correction, or safety-sensitive performance, presume in-person service is required.
2. **Will the learner be in motion?** If the purpose involves active movement, travel performance, new skill acquisition, immediate correction, or safety-sensitive performance, presume in-person service is required.
3. **What foreseeable risks are present?** Consider what could reasonably go wrong and whether the COMS could respond quickly enough to prevent harm. If foreseeable harm requires immediate intervention, the O&M instruction or assessment must not occur remotely or virtually.
4. **What technology is required to achieve the learner's goal(s)?** Consider if 1) the learner has access to the necessary technology, 2) does the learner have the ability to use the technology, 3) is the technology stable for reliable use over the course of the lesson(s), and 4) who is responsible for the technology. If the technology requirements for the learning objective(s) cannot be met, then in-person instruction must take place.
5. **What support, if any, is available on-site?** If an on-site support person is involved, define that person's role and limits in writing. The person may assist with communication, setup, or environmental description, but must not teach, prompt,

coach, supervise, authorize, or approve prohibited O&M tasks as noted above in "Non-Negotiable Limits."

6. **Can valid information be collected?** Determine whether the available format allows for accurate, complete, and defensible data collection. If data is incomplete, distorted, or dependent on a limited camera angle, the report must state those limitations and avoid high-stakes recommendations.
7. **When must service return to in person?** Establish clear triggers for in-person assessment or instruction, including changes in learner need, increased risk, technology limitations, inadequate observation, or a shift from consultation to active instruction or assessment.

Documentation

When deciding to provide negotiable/potential instructional opportunities, the provision of a professional rationale for using remote or virtual service and the safeguards that make the limited format appropriate is crucial. Documentation for repeated and/or prolonged instruction by the COMS should include:

- Learner-specific factors, including age, current O&M skills, travel experience, communication ability, safety awareness, judgment, self-correction, medical considerations, and support needs.
- The specific activity, environment, consultation need, or service purpose being addressed remotely or virtually, and why that format is appropriate for this learner and context.
- The skills, environments, risk levels, or decisions excluded from remote or virtual delivery.
- Any on-site support role, including explicit limits on what the support person may and may not do.
- A communication plan that includes but is not limited to the following, 1) the mode(s) of communication, 2) frequency, 3) who is communicated with, and 4) if applicable, an on-site support person who will organize communication.
- A plan that delineates stop conditions that would trigger immediate suspension or transition to in-person service.
- How progress or assessment data will be collected, what limitations exist, and how those limitations will be described in reports, recommendations, or billing descriptions.
- The anticipated duration of remote or virtual service, the plan for in-person follow-up when needed, and any consultation with supervisors, legal/risk personnel, or other professionals when ethical or safety concerns arise.

Minimum Standards During Remote or Virtual Service

When remote or virtual O&M is used, the COMS must maintain active professional control of the service model. Before and during each session, the COMS must:

1. Confirm written service parameters, including whether the service is consultative, supplemental, temporary, planning-based, or limited follow-up.

8. Verify that the activity does not fall within the non-negotiable limits identified in this position.
2. Use informed consent that explains the purpose, format, limitations, privacy considerations, risks, emergency procedures, and conditions for ending remote service.
3. Confirm reliable technology, adequate camera positioning, clear communication, and sufficient environmental awareness; suspend the session if any of these are inadequate.
4. Prohibit active travel, crossings, public transit, stairs, cane technique acquisition, or any other prohibited activity during a remote session.
5. Document decisions, risk considerations, observed limitations, and recommendations accurately, including any need for in-person follow-up.
9. Reassess appropriateness continuously and stop remote or virtual service if risk increases, the instructional target changes, or the format no longer supports ethical, safe, valid, and individualized O&M service.

Liability and Professional Accountability

O&M instruction occurs in environments where harm may be more present, including stairs, curbs, sidewalks, intersections, traffic areas, public transit, uneven surfaces, obstacles, and other real-world settings. Because risk is inherent, the COMS has a duty to assess risk in real time, sequence instruction appropriately, monitor readiness, document professional reasoning, and intervene when needed.

Remote and virtual delivery can increase liability exposure when it limits the COMS's ability to assess risk in real time, observe the full environment, evaluate sensory access, identify hazards, correct movement, or prevent injury. A delay in or lack of access to audio, video, communication, decision-making, or physical response may be the difference between timely intervention and potentially preventable harm.

Informed consent and documentation are important safeguards, but they do not excuse negligence, high risk, or unethical practice. A consent form, parent/guardian agreement, administrative directive, or technology waiver does not absolve the COMS or organization when foreseeable risk is not reasonably addressed.

Ethically unsound remote or virtual O&M, including failure to assess adequately, failure to identify risks, premature advancement, inaccurate reporting, unsafe delegation, or practice inconsistent with the COMS Code of Ethics, may constitute an ethical violation and may expose the COMS to complaints, disciplinary review, civil liability concerns, employment consequences, and certification action.

Under ACVREP disciplinary frameworks, misconduct that violates the COMS Code of Ethics may constitute grounds for discipline. Potential certification-related consequences may include private or public censure, suspension of certification and use of ACVREP certification marks for a specified period, or permanent termination of

certification and use of the certification marks, depending on the findings and applicable procedures.

No COMS should be required to choose between employment pressure and ethical practice. If a COMS determines that remote or virtual service is inconsistent with professional standards, the COMS must document the rationale, communicate the concern through appropriate channels, and recommend an ethically appropriate service model to the employer.

Concluding Position

Remote and/or virtual O&M can have a limited, useful role when it supports access, consultation, planning, concept review, and continuity of service without compromising safety or validity. It must not become a substitute for individualized, in-person O&M when direct observation, environmental access, physical modeling, immediate intervention, or valid performance data are necessary.

The controlling standard is not whether technology makes remote contact possible. The controlling standard is whether the COMS can provide ethical, valid, individualized, and defensible O&M service in that format. When the answer is no, in-person service is required.